

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

NEW YORKERS FOR RELIGIOUS LIBERTY, INC.,  
GENNARO AGOVINO, CURTIS CUTLER, LIZ  
DELGADO, JANINE DEMARTINI, BRENDAN  
FOGARTY, SABINA KOLENOVIC, KRISTA O'DEA,  
DEAN PAOLILLO, DENNIS PILLET, MATTHEW  
RIVERA, LAURA SATIRA, FRANK SCHIMENTI,  
JAMES SCHMITT, individually and on behalf of all other  
persons similarly situated,

Plaintiffs,

-against-

THE CITY OF NEW YORK; ERIC ADAMS, in his official  
capacity as Mayor of the City of New York, DAVE  
CHOKSHI, in his official capacity as Health Commissioner  
of the City of New York, and ROBERTA REARDON, in  
her capacity as New York State Commissioner of Labor,

Defendants.

-----X

**DECLARATION OF BILAL  
HAIDER IN SUPPORT OF  
DEFENDANTS CITY OF  
NEW YORK'S, ERIC  
ADAMS'S, AND DAVE  
CHOKSHI'S  
MEMORANDUM OF LAW  
IN OPPOSITION OF  
PLAINTIFFS' MOTION  
FOR A PRELIMINARY  
INJUNCTION**

22 Civ. 752 (DG) (VMS)

**BILAL HAIDER**, declares pursuant to 28 U.S.C. § 1746, under penalty of  
perjury, that the following is true and correct:

1. I am the attorney in the Office of George M. Pestana, Corporation Counsel of the  
City of New York, assigned to represent Defendants City of New York, Eric Adams, and Dave  
Chokshi, in the above-referenced action. As such, I am familiar with the facts stated below and  
hereby submit this declaration to place the relevant documents on the record in support of  
Defendants' Memorandum of Law in Opposition of Plaintiffs' Motion for a Preliminary  
Injunction.

2. Annexed hereto as Exhibit A is a copy of the Affirmation of Daniel Pollack dated  
February 10, 2022 and filed in New York State Supreme Court, County of New York on

February 10, 2022 in the matter of The New York City Municipal Labor Committee, by its Chair Harry Nespoli, et al. v. City of New York, et al., Index No. 151169/2022.

3. Annexed hereto as Exhibit B is a copy of the Affirmation of Eric Eichenholtz dated February 9, 2022 and filed in New York State Supreme Court, County of New York on February 10, 2022 in the matter of The New York City Municipal Labor Committee, by its Chair Harry Nespoli, et al. v. City of New York, et al., Index No. 151169/2022.

Dated: New York, New York  
February 11, 2022

GEORGIA M. PESTANA  
Corporation Counsel of the  
City of New York  
*Attorney for Defendants*  
100 Church Street  
New York, New York 10007  
(212) 356-3659  
bhaider@law.nyc.gov

By: *Bilal Haider* /s/  
Bilal Haider  
Assistant Corporation Counsel

cc: Counsel of Record (By ECF)